

The Honorable Tana Lin

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

EDGAR GUERRERO APODACA,

Plaintiff,

v.

EATON CORPORATION,

Defendant.

DAVID FITZPATRICK, and RYAN
MCDADE,

Intervention Plaintiffs,

v.

EATON CORPORATION, a Foreign Profit
Corporation,

Intervention Defendant.

No. 2:20-cv-01064-TL

**STIPULATED MOTION AND
(PROPOSED) ORDER FOR LIMITED
EXTENSION OF DISCOVERY CUTOFF**

STIPULATED MOTION

The Parties to this action respectfully request that the Court grant a limited extension of the discovery cutoff by one week, from October 14, 2022 to October 21, 2022, for the sole purpose of accommodating the scheduling of one deposition that remains outstanding.

STIPULATED MOTION AND ORDER FOR LIMITED
EXTENSION OF DISCOVERY CUTOFF– 1

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1 The Court's March 7, 2022 Order Resetting Jury Trial Date and Related Dates set a
 2 discovery cutoff of October 3, 2022. Dkt. No. 41. On September 16, 2022, pursuant to the
 3 Court's Standing Order for Civil Cases, the parties submitted a notice stipulating to extend the
 4 discovery cutoff to October 14, 2022. Dkt. No. 43.

5 Since that date, the parties have worked diligently and cooperatively to schedule all
 6 remaining discovery and depositions to occur by October 14, 2022. The Federal Rule of Civil
 7 Procedure 30(b)(6) deposition of Defendant Eaton Corporation was previously scheduled to
 8 occur on Thursday, October 6. Unfortunately, Eaton Corporation's designee was forced to
 9 postpone that deposition due to an urgent family medical issue. Plaintiffs' counsel have agreed
 10 to reschedule the deposition, and the parties have worked cooperatively to tentatively re-set the
 11 deposition to go forward on Friday, October 21, 2022 at 8:00 a.m. PST.

12 Accordingly, the parties request that the Court grant this limited extension of the
 13 October 14 discovery cutoff for the sole purpose of conducting the Federal Rule of Civil
 14 Procedure 30(b)(6) deposition of Eaton Corporation on October 21. The parties respectfully
 15 submit that good cause exists to grant this extension in light of the parties' diligent efforts to
 16 complete discovery within the existing cutoff; the unavoidable nature of the postponement of
 17 this deposition; and the fact that granting this limited request for the sole purpose of completing
 18 this final remaining deposition will not disrupt any other aspect of the case schedule.

19 STIPULATED AND AGREED this 18th day of October, 2022.

20
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STIPULATED MOTION AND ORDER FOR LIMITED
 EXTENSION OF DISCOVERY CUTOFF- 2

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ORDER

Based upon the parties' Stipulated Motion and Order for Limited Extension of Discovery Cutoff, the Court hereby finds good cause to GRANT the parties' stipulated motion. The October 14, 2022 discovery cutoff in this matter is extended to October 21, 2022 for the sole purpose of conducting the Federal Rule of Civil Procedure 30(b)(6) deposition of Defendant Eaton Corporation on October 21, 2022.

SO ORDERED this 19th day of October 2022.



Tana Lin
United States District Judge

Presented by:

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